

EXHIBIT 7

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION

3 IN RE: NATIONAL) MDL No. 2804
4 PRESCRIPTION OPIATE)
5 LITIGATION) Case No.
6) 1:17-MD-2804
7)
8 THIS DOCUMENT RELATES TO) Hon. Dan A. Polster
9 ALL CASES)
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10 — — —
Friday, February 22, 2019
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12 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
13 CONFIDENTIALITY REVIEW
14 — — —

17 Videotaped Deposition of MATTHEW ROGOS,
18 held at Marcus & Shapira LLP, One Oxford
19 Centre, Suite 3500, Pittsburgh, Pennsylvania,
20 commencing at 1:09 p.m., on the above date,
21 before Michael E. Miller, Fellow of the
22 Academy of Professional Reporters, Registered
23 Diplomate Reporter, Certified Realtime
24 Reporter and Notary Public.
25

23 — — —
24 GOLKOW LITIGATION SERVICES
25 877.370.3377 ph | fax 917.591.5672
deps@golkow.com

1 A. No.

2 Q. Okay. When you left HBC in May
3 of 2015, was that -- was that a voluntary
4 decision on your part?

5 A. It was.

6 Q. The role of distribution
7 operations manager, did you have essentially
8 kind of overall supervisory responsibility
9 for all operations of the warehouse?

10 A. Yes.

11 Q. And your counsel almost
12 objected. That reminded me just as a process
13 point. There may be some objections to
14 questions that I ask today, and if there are,
15 unless your counsel instructs you not to
16 answer, you understand that you will go ahead
17 and try to answer my question?

18 A. I'll try.

19 Q. Okay. So the operations of the
20 HBC warehouse, as I understand it, it was
21 only a portion of the overall warehouse that
22 was identified and specific to the
23 pharmaceutical distribution piece, correct?

24 A. That's correct.

25 Q. And within that pharmaceutical

1 distribution piece, there was also a separate
2 defined area that was secured for controlled
3 substances; is that true?

4 A. It is.

5 Q. Okay. But in terms of the
6 entire HBC warehouse, the pharmaceutical and
7 controlled substances part of that warehouse
8 was a relatively small part of the entire
9 warehouse; is that true?

10 A. That's correct.

11 Q. Okay. I asked you if you'd had
12 any, I think, training or experience prior to
13 HBC with -- dealing with distribution of
14 pharmaceuticals or controlled substances, and
15 you said you had not, correct?

16 A. That's correct.

17 Q. Do you recall any education --
18 and I'll ask you a little bit about your
19 education here in a second, but had you had
20 any education concerning Federal laws or
21 regulations concerning controlled substances?

22 MR. KOBRIN: Object to form.

23 Do you mean formal education or job
24 training, anything?

25 MR. BARTON: Well, yeah. I

1 mean, really anything.

2 BY MR. BARTON:

3 Q. Anything you would consider
4 education, whether it be formal education or
5 education through job training or anything.

6 A. Prior to getting to HBC?

7 Q. Correct.

8 A. No.

9 Q. Let's -- let me ask a little
10 bit about your education quickly, just -- it
11 appears you graduated from Penn State with a
12 Bachelor of Science in marketing; is that
13 right?

14 A. It is.

15 Q. With a minor in business
16 logistics?

17 A. Uh-huh.

18 Q. And that was 1997?

19 A. That's correct.

20 Q. Okay. And then after entering
21 the workforce, it appears you got an M.B.A.
22 from University of Pittsburgh, correct?

23 A. I did.

24 Q. That was in 2008?

25 A. It was.

1 Q. Okay. So did you leave work to
2 be a full-time student in the M.B.A., or were
3 you able to do that while working at Giant
4 Eagle?

5 A. I took night classes while
6 working at Giant Eagle.

7 Q. Okay. In your role as
8 distribution operations manager, did you
9 directly supervise managers underneath you,
10 so to speak?

11 A. I did.

12 Q. And how many managers were
13 under you at HBC?

14 MR. KOBRIN: Object to form.
15 BY MR. BARTON:

16 Q. How many managers did you
17 directly supervise?

18 A. I'm trying to think. I think
19 there was a minimum of three.

20 Q. Did any of those managers have
21 exclusive responsibilities to the
22 pharmaceutical area of the warehouse?

23 A. Not that I can remember.

24 Q. Okay. Yeah, I just wondered
25 if -- if there was someone who kind of had